

Exhibit 2

From: Rivera, Sylvia <SRivera@mofo.com>
Sent: Wednesday, October 04, 2017 7:09 PM
To: UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; Jeff Nardinelli; QE-Waymo; James Judah
Cc: Matthew Cate; John Cooper
Subject: RE: Waymo; Stroz materials at MoFo

For the benefit of those who were not on the parties' 5:30 p.m. call with the Special Master, the inspection request below was discussed. I declined the request on the ground that the Court specifically stated at yesterday's hearing that no new discovery is allowed, and incorporated that prohibition into today's order.

Sylvia

From: James Judah [mailto:jamesjudah@quinnemanuel.com]
Sent: Wednesday, October 04, 2017 5:33 PM
To: Rivera, Sylvia; John Cooper
Cc: UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; Matthew Cate; Jeff Nardinelli; QE-Waymo
Subject: RE: Waymo; Stroz materials at MoFo

- External Email -

Sylvia –

We request to inspect the Ottomotto Slack channels pursuant to the PI Order. Please let us know when we can conduct that inspection tomorrow or Friday.

Best,
James

From: Rivera, Sylvia [mailto:SRivera@mofo.com]
Sent: Wednesday, October 04, 2017 5:13 PM
To: John Cooper <JCooper@fbm.com>; James Judah <jamesjudah@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; Matthew Cate <MCate@fbm.com>; Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; QE-Waymo <qewaymo@quinnemanuel.com>
Subject: RE: Waymo; Stroz materials at MoFo

James and John,

An Excel spreadsheet containing metadata fields with cross-references to the photos in SFM006 will be produced tonight, probably within the next two hours. The spreadsheet is populated with the metadata information in the state in which Morrison & Foerster received it from Stroz. Metadata for certain fields was available for some, but not all photos. Our team has QC'd it for completeness.

Regarding Waymo's inquiry about Slack, I am not in a position to know what the Stroz team was referring to in the Stroz report. I can report, however, that Ottomotto.slack.com was merged with Uber ATG's Slack. Uber produced documents from Slack in response to RFP No. 5 of the RFPs Waymo served with the deposition notice for Asheem Linaval during the

expedited phase of discovery for Waymo's motion for preliminary injunction. Uber produced "non-privileged documents that discuss or mention the design of Waymo's LiDAR that have been collected from Defendants' internal Slack channels, sufficient to show Defendants' knowledge of Waymo's autonomous vehicle program."

I believe that resolves both issues, but I can be available for a brief call at 5:30 if still necessary. Thanks.

Regards,
Sylvia

From: John Cooper [<mailto:JCooper@fbm.com>]
Sent: Wednesday, October 04, 2017 3:36 PM
To: James Judah
Cc: Rivera, Sylvia; UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; Matthew Cate; Jeff Nardinelli; QE-Waymo
Subject: Re: Waymo; Stroz materials at MoFo

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Counsel

We can meet and confer on this at 5:30 if it is still necessary then. Please let me know. Call in is 888-759-6039 access 415-954-4410.

John

Sent from my iPhone; dictated to Siri

On Oct 4, 2017, at 3:32 PM, James Judah <jamesjudah@quinnemanuel.com> wrote:

Sylvia and John –

I do not believe we've received the metadata information yet for the MoFo materials, despite repeated emails from last week and then meeting and conferring on this issue on September 30 and October 2. John, we request a meet and confer to bring this closure on this issue today.

Also, can Uber/Ottomotto please provide an update on its search for, and production of, material in the Ottomotto Slack channels that were repeatedly referenced in the Stroz Report?

Best,
James

From: James Judah
Sent: Saturday, September 30, 2017 10:03 AM
To: Rivera, Sylvia <SRivera@mofo.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com; Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Subject: RE: Waymo; Stroz materials at MoFo

Sylvia,

The issue is that on the drive you produced at SFM006 (Bates no. SFM_00001249), all of the photos have create dates of September 2017, presumably when you copied the photos to the drive. We need to know, at least, the dates that the photos were actually taken, and neither the drive you provided nor yesterday's production and cross-reference file (SFM007) provide that information.

Best,
James

From: Rivera, Sylvia [<mailto:SRivera@mofo.com>]
Sent: Saturday, September 30, 2017 9:46 AM
To: James Judah <jamesjudah@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com; Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Subject: RE: Waymo; Stroz materials at MoFo

James,

The drive we produced, SFM006, has all of the photos in native format with all of the metadata. Yesterday's production of individual, bates'd photos (SFM007) was made in the same format as the previous production of individual, bates'd photos. Yesterday's production also included an Excel file containing a cross-reference between the ID numbers of the individually bates'd versions produced yesterday and the ID numbers of the native versions on the SFM006 drive, so you already have all of the metadata and can locate it easily.

Sylvia

From: James Judah [<mailto:jamesjudah@quinnemanuel.com>]
Sent: Friday, September 29, 2017 7:57 PM
To: Rivera, Sylvia; Jeff Nardinelli; QE-Waymo
Cc: UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: RE: Waymo; Stroz materials at MoFo

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Yes. We want all of these documents with metadata preserved, either in native form or with load files.

Also, Waymo is provisionally designating all of these documents as Waymo AEO.

From: Rivera, Sylvia [<mailto:SRivera@mofo.com>]
Sent: Friday, September 29, 2017 7:55 PM
To: James Judah <jamesjudah@quinnemanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: RE: Waymo; Stroz materials at MoFo

James,

I am informed that we transmitted this production tonight (SFM007) in the same format as the prior production from the drive of Mr. Levandowski's files. Are you asking for a different format?

Sylvia

From: James Judah [<mailto:jamesjudah@quinnemanuel.com>]
Sent: Friday, September 29, 2017 7:51 PM
To: Jeff Nardinelli; Rivera, Sylvia; QE-Waymo
Cc: UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: RE: Waymo; Stroz materials at MoFo

- External Email -

Counsel –

As requested in my email, please produce native versions of these documents that preserve metadata, and/or load volumes and tiffs with the metadata.

Best
James

From: James Judah
Sent: Friday, September 29, 2017 5:36 PM
To: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; Rivera, Sylvia <SRivera@mofo.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: RE: Waymo; Stroz materials at MoFo

Sylvia –

Can these documents be produced with Bates numbers and metadata tonight?

Best,
James

From: Jeff Nardinelli
Sent: Thursday, September 28, 2017 7:12 PM
To: Rivera, Sylvia <SRivera@mofo.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: RE: Waymo; Stroz materials at MoFo

Thanks Sylvia. Attached is a list of file names from the set we've reviewed that we would like produced.

Best,
Jeff

From: Rivera, Sylvia [<mailto:SRivera@mofo.com>]
Sent: Friday, September 22, 2017 8:54 PM
To: James Judah <jamesjudah@quinnemanuel.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: RE: Waymo; Stroz materials at MoFo

James,

We are sending the encrypted drive via messenger to your attention. I will send you the password under separate cover.

Sylvia

From: James Judah [<mailto:jamesjudah@quinnemanuel.com>]
Sent: Friday, September 22, 2017 8:14 PM
To: Rivera, Sylvia; QE-Waymo
Cc: UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: RE: Waymo; Stroz materials at MoFo

- External Email -

Sylvia –

Waymo agreed to this yesterday. Please immediately produce the drive.

Best,
James

From: Rivera, Sylvia [<mailto:SRivera@mofo.com>]
Sent: Friday, September 22, 2017 7:57 PM
To: QE-Waymo <gewaymo@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Uber-sg@LISTS.SUSMANGODFREY.COM; DG-GPOttoTruckingWaymo@goodwinlaw.com; JCooper@fbm.com; MCate@fbm.com
Subject: Waymo; Stroz materials at MoFo

James,

As discussed, and per the request Waymo made yesterday, Morrison & Foerster LLP will produce a drive containing copies of the Anthony Levandowski materials that it received from Stroz in its capacity as counsel for Mr. Levandowski in the Google arbitrations, which have been available for inspection since September 14. We are excluding the files that were designated as personal with the Special Master's approval. In order to get you the materials as quickly as practicable, we have not processed and individually Bates labeled each file, but instead are assigning one Bates number to the whole drive. This production is subject to the parties' agreement to follow the protocol currently in place as to the remote review of the Relativity database hosted by Stroz and containing the Diligenced Employees' materials. Specifically, if Waymo identifies a file that it wants to use (including but not limited to downloading, printing, print to PDF), you will notify us and we will create and produce a Bates labeled

version as soon as practicable. If you are selecting the file for use at a deposition that will occur within 24 hours, a Quinn lawyer may go ahead and print the file, but must promptly circulate it to counsel for the parties to the litigation. We will assign it a Bates number and produce it, but you need not wait for a Bates number to use the document at deposition, provided that it was circulated.

Please confirm your agreement and we will have the drive delivered. Thanks.

Regards,
Sylvia

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[Farella Braun + Martel LLP](#)

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